

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

JOHN JAMES PULGARIN AGUDELO

and

JOSE RUBEN CONTRERAS,  
a/k/a "Palomo"

and

JOSE LUIS PINO LEAL,  
a/k/a "Dumbo"

Defendants.

UNDER SEAL

No. 1:20-CR-241



Count 1: Conspiracy to Distribute Five Kilograms or More of Cocaine Knowing and Intending and Having Reasonable Cause to Believe that it will be Unlawfully Imported into the United States  
(21 U.S.C. § 963)

Forfeiture Notice: 18 U.S.C. § 924(d); 21 U.S.C. §§ 853, 970; 28 U.S.C. § 2461(c)

INDICTMENT

October 2020 Term – at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Conspiracy to Distribute Five Kilograms or More of Cocaine Intending, Knowing, and Having Reasonable Cause to Believe that it Would be Unlawfully Imported into the United States)

From at least in or about January 2019 and continuing to in or about October 2020, both dates being approximate and inclusive, in the country of Colombia and elsewhere, and in an offense begun and committed outside the jurisdiction of a particular State or district of the United States, the defendants John James PULGARIN AGUDELO, Jose Ruben CONTRERAS (also known as "Palomo"), and Jose Luis PINO LEAL (also known as "Dumbo"), all of whom will be first brought to the Eastern District of Virginia, did knowingly and intentionally combine, conspire, confederate, and agree with others, known and unknown to the Grand Jury, to knowingly and intentionally distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States.

(All in violation of Title 21, United States Code, Sections 959(a), 960(a), and 963.)

FORFEITURE NOTICE

THE GRAND JURY HEREBY FINDS probable cause that the property described in this NOTICE OF FORFEITURE is subject to forfeiture pursuant to the statutes described herein.

Pursuant to Fed. R. Crim. P. 32.2(a), the defendants are hereby notified that, if convicted the offense charged in Count One of this Indictment, they shall forfeit to the United States the following: (1) Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the offense; (2) Any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense; and (3) Any firearm or ammunition used in or involved in the offense..

Pursuant to 21 U.S.C. § 853(p), the defendants shall forfeit substitute property, if, by any act or omission of theirs, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(All pursuant to Title 18, United States Code, Section 924(d); Title 21, United States Code, Sections 853 & 970; Title 28, United States Code, Section 2461(c); and Fed. R. Crim. P. 32.2)

A TRUE BILL:

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

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FOREPERSON OF THE GRAND JURY

G. Zachary Terwilliger  
United States Attorney

By:

  
Ryan Bredemeier  
Assistant United States Attorney

  
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Raj Parekh  
First Assistant United States Attorney